

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

150 E. 18<sup>th</sup> St., Suite PHR • New York, NY 10003  
Tel (212) 228-9795 • Fax (212) 982-6284  
NYJG@aol.com

October 19, 2020

**VIA ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Hedges v. Champlain College Incorporated,*  
Case No.: 1:20-cv-6079-PGG-SN

Dear Judge Gardephe,

The undersigned represents Donna Hedges, on behalf of herself and all other persons similarly situated (“Plaintiff”), in the above-referenced action against Champlain College Incorporated, (“Defendant”). We write, with Defendant’s consent to inform the Court that the Parties have reached a settlement in principle, and respectfully request that Your Honor dismiss this action with prejudice with the right to reopen in thirty days if the Settlement Agreement is not consummated. In light of the anticipated settlement, the undersigned respectfully requests all currently pending deadlines in this action be adjourned *sine die*.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/Jeffrey M. Gottlieb, Esq.  
Jeffrey M. Gottlieb, Esq.

cc: all counsel of record VIA ECF